

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

FILED

JAN 07 2021 DB

UNITED STATES OF AMERICA,
ex rel DAVID FLORENCE AND CHELSEA
BASS

PLAINTIFF-RELATOR,

v.
ENVISION HEALTHCARE and KKK & Co.
Inc.

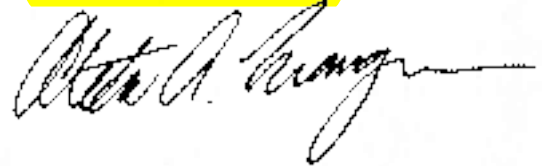
DEFENDANTS.

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN.

3:19-0493

(Under Seal if appropriate)

Motion (DE #52) GRANTED.
Extension to 3/15/2021.



REQUEST FOR ADDITIONAL TIME

COMES NOW the plaintiffs, Dr. David G. Florence and Chelsea Bass, R.N., In Proper Person, and would request that this Honorable Court grant the plaintiffs additional time to secure counsel and also additional time then to obtain service on the defendants.

As the Court knows, we had counsel when the suit was filed and since our prior counsel has withdrawn, we have been diligently seeking to secure necessary representation in the matter; however, as the Court well knows, these type of lawsuits are very complex and most law firms do not deal with these type lawsuits in their practice. We have contacted a number of law firms most of which were interested in the case, but just felt it was more than they could handle.

We currently are working with a whistle blower firm that is evaluating the case and completing their due diligence and will soon let us know if they will represent us.

I am a front line COVID-19 physician who evaluates and treats COVID patients in the E.R., ICU and COVID units. I recently treated 45 confirmed patients in one day – that means